

FILED
U.S. DISTRICT COURT

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DISTRICT OF UTAH

BY: ~~ROB TURLEY~~

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

)
KODY BROWN, MERI)
BROWN, JANELLE BROWN, CHRISTINE)
BROWN, ROBYN SULLIVAN,)
)
Plaintiffs,) **MOTION FOR PRO HAC VICE ADMISSION**
)
v.)
)
GARY R. HERBERT, in his official)
capacity as Governor of Utah; MARK)
SHURTLEFF, in his official capacity as)
Attorney General of Utah; JEFFREY R.)
BUHMAN, in his official capacity as)
County Attorney for Utah County,)
)
)
Defendants.)

CONSENT OF LOCAL COUNSEL

JUDGE: 2:11cv652cw

CIVIL NO. _____

Pursuant to D.U. Civ R 83-1.1(d), I, Adam Alba, move the admission of Jonathan Turley as pro hac vice counsel for plaintiffs and consent to serve as local counsel. The application for pro hac vice admission is attached as Exhibit A to this motion. A proposed order is attached as Exhibit B, and an Electronic Case Filing Registration Form is attached as Exhibit C. The admission fee has been paid to the court with the submission of this motion.

Professor Turley is lead counsel for the Brown family. He meets the standard expected by the court of a pro hac vice counsel. He has previously served pro hac vice in various states and has handled some of the most notable constitutional and criminal cases of the last decade. He has been repeatedly ranked as one of the country's top litigators. His bio is available at <http://jonathanturley.org/about/>. Professor Turley is also currently serving as an expert on international and U.S. law in the Canadian Supreme Court's consideration of whether the criminalization of polygamy is a violation of the Charter on Human Rights and international law. His participation as lead counsel will guarantee that this case is prosecuted with the high standards and expertise in the field.

In light of the foregoing, the undersigned respectfully moves for the admission of Jonathan Turley as pro hac vice counsel for the plaintiffs.

Dated July 13, 2011



Adam Alba